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**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION**

FINJAN, LLC, a Delaware Limited Liability Company,

Plaintiff,

V.

Case No.: 5:17-cv-04467-BLF-VKD

**DEFENDANT SONICWALL INC.'S
IDENTIFICATION OF REMAINING
ISSUES IN ITS PENDING MOTION TO
STRIKE**

SONICWALL INC., a Delaware Corporation.

Defendant

1 SonicWall hereby files this response to the Court's March 8, 2021 Order (ECF 386).
 2 SonicWall specifies the following two remaining issues in its Motion to Strike (ECF 300) that still
 3 require resolution:

4 1. Finjan's infringement contentions associated with the '408 Patent detailed in Section
 5 III.B. of the Motion to Strike. SonicWall agrees with the Court's review that these issues remain
 6 alive.

7 2. Finjan's infringement contentions associated with the '780 Patent detailed in Section
 8 III.C. of SonicWall's Motion to Strike. The Court's Order on SonicWall's Motion for Partial
 9 Summary Judgment (ECF 381) eliminated all of Finjan's infringement theories for the '780 Patent
 10 involving SonicWall's Gateways. However, Finjan's expert report also includes infringement
 11 allegations for the '780 Patent accusing (i) Capture ATP alone and (ii) Capture ATP in combination
 12 with SonicWall's Email Security ("ES") products. Both of these allegations are at issue in Section
 13 III.C of the Motion to Strike (concerning Capture ATP allegedly extracting files from compressed or
 14 archive files). SonicWall believes that the resolution of the issues identified in Section III.C of the
 15 Motion to Strike should lead to the elimination of all remaining infringement theories concerning the
 16 '780 Patent, but SonicWall would confer with Finjan on the status of the '780 Patent in the event the
 17 Court were to grant this portion of the Motion to Strike.

18 Dated: March 11, 2021

19 Respectfully Submitted,

20 /s/ Nicole E. Grigg

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